

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Kurt Douglass Fritz
Wendlolyn M. Douglass

Debtors

Chapter 13

Bankruptcy No.23-13016-PMM

OBJECTION OF CHAPTER 13 TRUSTEE
TO CONFIRMATION OF PLAN OF DEBTORS

AND NOW comes Scott F. Waterman, Esq., Standing Chapter 13 Trustee, to object to confirmation of the chapter 13 plan of the Debtors, because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or Debtors have failed to provide information, evidence, or corrections to the petition, schedules, statements, or other documents filed by Debtors to enable the standing trustee to evaluate the Plan for confirmation, as follows:

The Plan is unclear and/or incorrect as to how the secured and priority claims are to be treated and/or paid by the standing trustee.

The Plan fails to provide that all of the projected disposable income of debtor(s), who has/have current monthly income which is above median, will be applied to make payments to unsecured creditors under the Plan, in violation of 11 U.S.C. Section 1325 (b)(3).

The Plan violates 11 U.S.C. Section 1325(a)(4) in that the value of property to be distributed under the plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate of the debtor(s) were liquidated under Chapter 7.

The Plan is underfunded in that the total filed proofs of claim which are to be paid through the Plan exceed the value of the Plan.

WHEREFORE, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ Scott F. Waterman

Scott F. Waterman, Esquire
Chapter 13 Standing Trustee